

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Case No. 24-90398 (CML)
SouthRock Capital Ltda., <i>et al.</i> ¹	§	
	§	Chapter 15
	§	
Debtors in Foreign Proceeding.	§	(Jointly Administered)
	§	

**AGENDA OF MATTERS SET FOR HEARING ON
AUGUST 1, 2024, AT 10:00 A.M. (PREVAILING CENTRAL TIME)**

SouthRock Capital Ltda. and its debtor affiliates in the above-captioned chapter 15 cases, as debtors and debtors in possession (collectively, the “Debtors”), hereby file this Agenda of Matters Set for Hearing on **August 1, 2024, at 10:00 a.m. (Prevailing Central Time)** before the Honorable Christopher M. Lopez. The hearing will be conducted in Courtroom 401, 4th Floor, 515 Rusk, Houston, Texas 77002. You may participate in the hearing either in person or by an audio and video connection. Audio communication will be by use of the Court’s dial-in facility. You may access the facility at 832-917-1510 and entering the conference code 590153. Video communication will be by use of the Gotomeeting Platform. Connect via the free Gotomeeting Application or click the link on Judge Lopez’s home page. Click the settings icon in the upper right corner and enter your name under the personal information setting.

¹ The debtors in these chapter 15 cases, along with the last four digits of each debtor’s Brazilian tax identification number, are as follows: (a) SouthRock Capital Ltda. (01-35); (b) Americana Franquia S.A. (01-51); (c) Brazil Airport Restaurantes S.A. (01-73); (d) HB Participações S.A. (01-57); (e) SRC 5 Participações Ltda. (01-02); (f) SRC 6 Participações Ltda. (01-41); (g) SRC Holding Participações S.A.(01-74); (h) SR N Participações S.A. (01-01); (i) Star Participações S.A. (01-09); (j) Starbucks Brasil Comércio de Cafés Ltda. (01-00); (k) SW do Brasil Ltda. (01-20); (l) SW Stores do Brasil Ltda. (01-36); and (m) Wahalla Ltda. (01-10). The Debtors’ mailing and service address is Avenida Paulista, 1294, 14^o andar, sala 14, Bela Vista, São Paulo/SP, CEP 01310-915, Brazil.

I. CONTESTED MATTERS:

1. Banco Modal S.A.'s Emergency Motion to Quash Foreign Representative's Document Request to Banco Modal, S.A. Pursuant to Bankruptcy Rule 2004 (ECF No. 76)

Responses:

- Opposition to Banco Modal S.A.'s Emergency Motion to Quash Foreign Representative's Document Request to Banco Modal S.A. Pursuant to Bankruptcy Rule 2004 (ECF No. 87)

Related Documents:

- SouthRock Capital Ltda.'s Document Request to Banco Modal S.A. Pursuant to Fed. R. Bankr. P. 2004 (ECF No. 59)

Status: This matter is going forward.

2. Ativos Funds' Emergency Motion to Quash Notice of Rule 2004 Examination and Subpoenas Duces Tecum and for Protective Order (ECF No. 80)

Responses:

- Opposition to Ativos' Emergency Motion to Quash Notice of Examination and Subpoena Duces Tecum and for Protective Order (ECF No. 86)

Related Documents:

- SouthRock Capital Ltda.'s Document Request to Ativos Especiais II - Fundo de Investimento em Direitos Creditórios - NP, and Ativos Especiais III - Fundo de Investimento em Direitos Creditórios - NP Pursuant to Fed. R. Bankr. P. 2004 (ECF No. 58)

Status: This matter is going forward.

3. Joint Verified Petition for Recognition of Foreign Main Proceedings and Motion for Order Granting Related Relief Pursuant to Bankruptcy Code Sections 1515, 1517, 1520 and 1521 (ECF No. 9)

Responses:

- Limited Objection and Reservation of Rights of Banco Modal S.A. to the Emergency Motion of Foreign Representative for Provisional Relief Pursuant to Bankruptcy Code Sections 1519, 1521, 362 and 105 (ECF No. 17)

- Ativos Funds' Limited Objection to Emergency Motion of Foreign Representative for Provisional Relief (ECF No. 18)
- The Ibiuna Creditor's Objection, Reservation of Rights, and Joinder in Opposition to Emergency Motion of Foreign Representative for Provisional Relief Pursuant to Bankruptcy Code Sections 1519, 1521, 362, and 105 (ECF No. 24)
- Banco Votorantim S.A.'s Supplement to Limited Objection and Notice of Intent to Raise an Issue of Foreign Law (ECF No. 88)
- The Ativos Funds' Supplemental Brief in Support of Limited Objection to Emergency Motion of Foreign Representative (ECF No. 89)
- The Ibiuna Creditors' Supplemental Objection, Joinder, and Reservation of Rights in Opposition to Emergency Motion of Foreign Representative for Provisional Relief with Respect to Kenneth Pope (ECF No. 91)
- The Ibiuna Creditors' Notice of Intent to Raise Issues of Foreign Law (ECF No. 92)
- Banco Modal S.A.'s Supplemental Objection to the Foreign Representative's Request to Extend the Automatic Stay or Grant Other Injunctive Relief for the Benefit of a Nondebtor (ECF No. 94)

Status: This matter is going forward with respect to Kenneth Pope.

Respectfully submitted on July 31, 2024.

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

/s/ Patricia B. Tomasco

Patricia B. Tomasco

SBN 01797600

Joanna D. Caytas

SBN 24127230

Razmig Izakelian (*admitted pro hac vice*)

Alain Jaquet (*admitted pro hac vice*)

700 Louisiana Street, Suite 3900

Houston, Texas 77002

Telephone: 713-221-7000

Facsimile: 713-221-7100

Email: pattytomasco@quinnemanuel.com

Email: joannacaytas@quinnemanuel.com

Email: razmigizakelian@quinnemanuel.com

Email: alainjaquet@quinnemanuel.com

**COUNSEL FOR FABIO D. ROHR,
FOREIGN REPRESENTATIVE**

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2024, a copy of the foregoing Agenda was served through the Court's CM/ECF notification system to all parties who have appeared in this case through counsel or who have submitted a request for service by CM/ECF.

/s/ Patricia B. Tomasco

Patricia B. Tomasco